UNITED STATES FEDERAL COURT
FOR THE DISTRICT OF MASSACHUSETTS

CIVIL DOCKET NO: 16-CV-10105 ⁓ ᴏ ꝫ ᴄ

ANDRE BISASOR	)
PLAINTIFF,	)
	)
V.	)
	)
DANSLAV SLAVENSKOJ,	)
DEFENDANTS	)
	)

MOTION FOR LEAVE OF COURT TO FILE AND TO EXCEED THE 20 PAGES FOR AN AMENDMENT TO PLAINTIFF'S MOTION TO STAY WITH MEMORANDUM & EXHIBITS [ECF #24]

1. I, Andre Bisasor, the Plaintiff in the above named case, hereby make retroactively this motion for leave of court to file and to exceed the 20 pages for amendment to my motion to stay with memorandum and exhibits [ECF#24].

2. On May 20, Harvard filed an opposition to my motion #24. In it, they cite for the first time that I may have made an oversight in not asking the court for leave to file an amendment/replacement/supplement with missing a memorandum of support and missing exhibits now included. I am not sure what rule they are referencing but in the abundance of caution, I am hereby attempting to be proactive to correct this oversight, if in fact an oversight has been made.

3. On May 2, 2016, I had filed a motion to stay pending appeal [ECF #23]. It contained no memorandum or exhibits. It was just a motion. It was 11 pages.

4. After I filed that document, I realized I neglected to include a memorandum of support and that I excluded key exhibits that provided critical support to factual assertions made.

5. So on May 6, 2016, I filed an amendment/supplement with memorandum and exhibits.

6. I did not know that I had to ask for leave of court for the above.

7. Given my lack of training as a lawyer, I was not sure how to approach what I was trying to accomplish, which is why in said motion I had asked the court for guidance if I did anything incorrectly or applied incorrect statutes when there were better ones available.

8. I also was not sure if I should have withdrawn ECF 23 and replaced it with ECF 24 or if I should amend it or supplement it. Technically speaking, if it a replacement or amendment, I am assuming that I did not need to do a motion for leave, but again in the abundance of caution, I am hereby proactively taking stapes to correct any oversight that I may have made.

9. The court typically honors substance over form when it comes to pro se plaintiffs.

10. Also, ECF #24 contained 27 pages without certificate of service and 24 pages excluding the first 3 pages which included a preface and a repeat of the actual motion request contained in prior motion filed on May 2 [ECF#23]. So the actual memorandum itself was 24 pages.

11. Because I am not a lawyer, and not accustomed to making legal arguments in court, I require a little leeway in being able to develop my arguments, quote statutes, cite cases, and present material in a persuasive, informative but concise way.

12. So I ask for permission for my motion ECF #24 to be accepted and that my motion not be ignored based on technicalities as Harvard has asked.

13. Going forward, I will take note of this issue.

WHEREFORE, I hereby humbly request this Honorable Court grant my request and/or other relief that the Court deems just and proper.

Respectfully submitted,

Andre Bisasor
Plaintiff Andre Bisasor
119 Drum Hill Rd, #233
Chelmsford MA 01824
781-492-5675

Dated: May 23, 2016

CERTIFICATE OF SERVICE

I hereby certify that on this date, upon information and belief, the Court's ECF system will serve an electronic copy of the foregoing upon the following counsel of record:

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Murphy & Riley P.C.

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I further certify that on this date, I caused a copy of the foregoing to be served upon each of the following non-ECF registered parties:

Ken Vedaa, pro se

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Paeonian Springs, VA 20129

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Plaintiff Andre Bisasor
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Dated: May 23, 2016